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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

11 JAMES FRANCIS HENRY,  
12 Plaintiffs,  
13 vs.  
14 GC SERVICES, LP,  
15 Defendant.

} Case No. CV 11-05964-GHK(VBKx)  
}  
}{**STIPULATION FOR AGREED  
PROTECTIVE ORDER**

Plaintiff, JAMES FRANCIS HENRY, and Defendant, GC SERVICES LIMITED PARTNERSHIP (“the Parties”), by and through their respective undersigned counsel, having agreed to the entry of a Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, move this court to enter the Agreed Protective Order attached hereto, and in support thereof state as follows:

23       1. This lawsuit involves claims brought under the Fair Debt Collection  
24 Practices Act, (FDCPA), 15 U.S.C. §1692 *et seq.*, the Rosenthal Fair Debt  
25 Collection Practices Act, Cal. Civ. Code §1788, *et seq.* (RFDCPA), and the  
26 Telephone Consumer Protection Act, 47 U.S.C. §227 (TCPA).

27       2. In order to facilitate the exchange of certain confidential information,  
28 the parties have agreed to seek the entry of the attached agreed protective order.

1 The categories of documents that may be designated as confidential and sought to  
2 be protected by the agreed order include:

3 a. Plaintiff's Account Detail Listing and/or account notes  
4 produced in this matter; Collection Excellence Level 1: Collection  
5 Policies & Procedures; Collection Excellence Level 2: Negotiating  
6 Account Resolution; Adhering to Federal and State Laws, Facilitator's  
7 Guide; and 3rd Party Making Excellent Collection Calls.

8 b. In addition, a producing party may, as provided herein and  
9 subject to the terms and conditions herein, designate as confidential  
10 any documents (and information contained therein) that it produces by  
11 marking such documents with the legend "CONFIDENTIAL" when  
12 copies are produced to the receiving party. Alternatively, a party may  
13 designate as confidential any document or category of documents by  
14 providing notice to all parties in this action. Any prior production, or  
15 any preliminary production of documents for inspection and  
16 designation for copying by the receiving party shall not constitute a  
17 waiver of confidentiality, however, even if those documents have not  
18 been marked CONFIDENTIAL or designated as confidential in  
19 writing. If documents were produced prior to this order either for  
20 inspection and designation or for some other purpose have not been  
21 marked CONFIDENTIAL before inspection, only counsel of record  
22 and other people described in paragraphs 7(a) and 7(c) may inspect  
23 those documents.

24 3. The parties met and conferred to discuss entering a protective order as  
25 information in these categories may be subject to protection pursuant to a  
26 protective order.

1           4. A copy of the Agreed Protective Order which the parties have agreed  
2 to is attached.

3           WHEREFORE, Plaintiff and Defendant respectfully request the court grant  
4 this Motion and enter the attached Agreed Protective Order.

5  
6           DATED: April 11, 2012

7           /s/ Amy L. Bennecoff  
8           Amy L. Bennecoff, Esq.  
9           Kimmel & Silverman, P.C.  
10           30 East Butler Pike  
11           Ambler, PA 19002  
12           215-540-8888 x 133  
13           [abennecoff@creditlaw.com](mailto:abennecoff@creditlaw.com)

14           DATED: April 11, 2012

15           /s/ Renee C. Ohlendorf  
16           Renee C. Ohlendorf  
17           Hinshaw & Culbertson LLP  
18           11601 Wilshire Blvd., Suite 800  
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## PROOF OF SERVICE

**STATE OF CALIFORNIA- COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11601 Wilshire Blvd., Suite 800, Los Angeles, CA 90025.

On April 11, 2012, I served the foregoing documents described as: **STIPULATION FOR AGREED PROTECTIVE ORDER**, on the following attorney(s) of record and/or interested parties in this action, by placing a true and correct copy(ies) thereof enclosed in sealed envelope(S), addressed as follows, by the following means:

Amy L. Bennecoff, Esq.  
Dawn Grob, Paralegal  
Kimmel & Silverman, P.C.  
30 East Butler Pike  
Ambler, PA 19002  
215-540-8888 x 133  
877-788-2864 Fax  
[abennecoff@creditlaw.com](mailto:abennecoff@creditlaw.com)  
[dgrob@creditlaw.com](mailto:dgrob@creditlaw.com)

(BY MAIL): I deposited such envelope in the mail at Los Angeles, California with postage fully prepaid. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be placed for collection and mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

**(VIA OVERNIGHT MAIL):** I deposit such envelope to be placed for collection and handling via UPS following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for UPS. On the same day that material is placed for collection, it is picked by UPS at Los Angeles, California.

(BY CM/ECF SERVICE): I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

Executed on April 11, 2012, at Los Angeles, California.

**(FEDERAL):** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct

*W. H. D.*